

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Global Expedited Package Services 8 Contracts
Negotiated Service Agreements

Docket No. MC2017-183

Competitive Product Prices
Global Expedited Package Services 8 Contracts
(MC2017-183)
Negotiated Service Agreement

Docket No. CP2017-284

PUBLIC REPRESENTATIVE COMMENTS ON
REQUEST OF UNITED STATES POSTAL SERVICE FILING A
FUNCTIONALLY EQUIVALENT GLOBAL EXPEDITED PACKAGE SERVICES 8
NEGOTIATED SERVICE AGREEMENT

(September 13, 2017)

In response to a Commission notice initiating this docket¹, the Public Representative hereby comments on the request of United States Postal Service to add Global Expedited Package Services 8 contracts to the competitive products lists (Request).²

The Postal Service states that the contract that is subject of CP2017-284 establishes compliance with the policies of 39 U.S.C. §§ 3632-3633 and 39 C.F.R. § 3015.5. *Request at 3*. The Request also includes six separate attachments that also demonstrate support of compliance with applicable policies.³

GEPS 8 contracts are “similar to GEPS 5 Contracts, whereby the Postal Service provides prices for some combination of Priority Mail International (PMI), Priority Mail Express International (PMEI), First Class Package International Service (FCPIS), and

¹ Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, September 6, 2017.

² Request of United States Postal Service to add Global Expedited Package Services 8 Contracts to the Competitive Products Lists and Notice of Filing (Under Seal) of Contract and Application for Non-Public Treatment of Materials Filed Under Seal, September 5, 2017 (Request).

³ Attachment 1 is a statement of supporting justification. Attachment 2 is a redacted version of Governors' Decision No. 11-6. Attachment 3 proposes revisions to MCS section 2510.3. Attachment 4 is a redacted version of the GEPS 8 contract subject of Docket No. CP 2017-284. Attachment 5 is a redacted version of the certified statement concerning the GEPS 8 contract that is subject of Docket No. CP2017-284. Attachment 6 is an application for non-public treatment of materials filed under seal. *Request at 2-3*.

Commercial ePacket (CeP) parcels to a customer.” *Request* at 3. The Request states that several annexes of GEPS 8 contracts stipulate price tables for products offered to customers. *Request* at 4.

The Postal Service will notify the Mailer of the Effective Date of the Agreement as soon as possible, but no later than thirty (30) days, after receiving the approval. *Attachment 4* at 3. The duration of the contract extends for one calendar year from the effective date or the last day of the month which falls one calendar year from the Effective Date, whichever is later, unless terminated sooner. *Id.*

Conclusion

The Public Representative, after accessing and comparing materials the United States Postal Service submitted under seal in this matter and the corresponding baseline agreement, acknowledges that the pricing in the present GEPS 8 contract comports with relevant provisions of title 39. This contract also appears able to generate sufficient revenue to cover attributable costs. In addition, this contract employs pricing incentives based upon volumes and other provisions favorable to the Postal Service.

The Public Representative respectfully submits the preceding comments for the Commission’s consideration.

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